

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

KIMBERLY GENEREUX,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
COLUMBIA SUSSEX CORPORATION	)	
d/b/a WESTIN CASUARINA HOTEL,	)	
STARWOOD HOTELS & RESORTS	)	
WORLDWIDE, INC., WESTIN LICENSE	)	
COMPANY, WESTIN LICENSE	)	Civil Action No. 05-CV-10879-JLT
COMPANY NORTH, WESTIN	)	
MANAGEMENT COMPANY NORTH,	)	
INC., WESTIN MANAGEMENT	)	
COMPANY EAST, WESTIN NORTH	)	
AMERICA MANAGEMENT COMPANY,	)	
INC., GALLEON BEACH RESORT, LTD.,	)	
and CORPORATE DEFENDANTS X1-	)	
100,	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' SWORN STATEMENT PURSUANT TO LOCAL RULE 26.1(B)**

Pursuant to Local Rule 26.1(b) of the United States District Court for the District of Massachusetts, defendants Westin License Company ("Westin License Co.") and Westin International Services, LLC, as successor by merger to Westin Management Company North, Westin Management Company East and Westin North America Management Company ("Westin L.P.")(Westin License Co. and Westin L.P. will sometimes hereinafter collectively be referred to as the "Westin Defendants"), hereby provide their sworn statement as follows:

**A. Individuals Likely To Have Discoverable Information Regarding The Claims Or Defenses In This Action**

At this time, the Westin Defendants believe that the following persons may have discoverable information concerning the matters in controversy:

1. Plaintiff Kimberly Genereux.
2. Daphne Hampson, former Director of Franchise Operations for Starwood Hotels & Resorts Worldwide, Inc. Ms. Hampson's address is 10660 Hollymount Dr., Richmond, British Columbia, V7E4Z2. Ms. Hampson may have spoken with employees at the Westin Casuarina Hotel about the incident that is the subject of this case.
3. Steven Sherman, Design Manager, Starwood Hotels & Resorts Worldwide, Inc. Mr. Sherman may be reached through counsel for the Westin Defendants. Mr. Sherman may have knowledge about the design of the Westin Casuarina Hotel.
4. Diana Oreck, former employee of Starwood Hotels & Resorts Worldwide, Inc. Starwood Corp. does not know Ms. Oreck's current address but understands that she works at Ritz Carlton/Marriott Hotels, Bethesda, Maryland. Ms. Oreck may have knowledge about the design of the Westin Casuarina Hotel.
5. The proposed deponents identified in Section IV of the parties' Joint Statement Pursuant To Local Rule 16.1.

**B. Statements**


The Westin Defendants have obtained no written statements from opposing parties, or from any officers, directors, or employees thereof, regarding the subject matter of the claim or defenses in this case.

**C. Investigations**

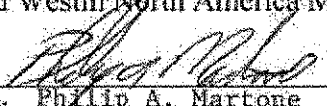
The Westin Defendants are not aware of any governmental or agency investigations regarding the matters in controversy other than those already identified by the parties in their initial disclosures in this action.

Signed under the pains and penalties of perjury this 11<sup>th</sup> day of May, 2006.

Westin License Company

  
By: Orlando Figueroa  
Its: Vice President

Westin International Services, LLC, as successor  
by merger to Westin Management Company  
North, Westin Management Company East  
and Westin North America Management Company

  
By: Phillip A. Martone  
Its: Vice President

WESTIN LICENSE COMPANY and WESTIN  
INTERNATIONAL SERVICES, LLC, as  
successor by merger to WESTIN  
MANAGEMENT COMPANY NORTH,  
WESTIN MANAGEMENT COMPANY EAST  
and WESTIN NORTH AMERICA  
MANAGEMENT COMPANY

By their attorneys,

/s/ Stephen C. Bazarian

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Dated: May 12, 2006